

KUTAK ROCK LLP

Michael A. Condyles (VSB No. 27807)

Craig B. Young (VSB No. 22633)

1021 East Cary Street, Ste. 810

Richmond, VA 23219

(804) 343-5227

Counsel Newtek Small Business Finance, LLC

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE: MARCANTONIO W. BARNES,

Debtor.

**Case No. 23-11190-KHK
Chapter 11**

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE THAT pursuant to Fed. R. Bankr. P. 2002(a)(4) on May 8, 2025, Newtek Small Business Finance, LLC (“Newtek”), by counsel, filed a *Motion to Dismiss or in the Alternative Convert Bankruptcy Case and Memorandum in Support Thereof* (the “Motion”).

UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views, then within 21 days of service of the Motion, you or your attorney must:

1. File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1. If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above. Your mailing should be directed to:

Clerk of the Court
United States Bankruptcy Court
200 S. Washington Street
Alexandria, VA 22314

2. You must also mail a copy to:

Michael A. Condyles, Esq.
Craig B. Young, Esq.
Kutak Rock, LLP
1021 E Cary Street, Ste. 810
Richmond, VA 23219

3. You must also attend the hearing to consider the relief sought in the Motion in addition to filing a written response. The hearing is scheduled for **June 10, 2025 at 11:00 a.m.**, at the United States Bankruptcy Court, Courtroom I, second floor, 200 S. Washington Street, Alexandria, Virginia 22314.

/s/ Michael A. Condyles

KUTAK ROCK LLP

Michael A. Condyles (VSB No. 27807)

Craig B. Young (VSB No. 22633)

1021 East Cary Street, Ste. 810

Richmond, VA 23219

(804) 343-5227

Counsel Newtek Small Business Finance, LLC

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I hereby certify under penalty of perjury that on May 8, 2025, I served a copy of this document by first class mail, postage prepaid on the following necessary parties, including all creditors and parties in interest as follows:

Daniel Press, Esq.
Chung & Press, P.C.
6718 Whittier Avenue, Ste. 200
McLean, VA 22101
Counsel to the Debtor

Marc Elliott Albert, Trustee
Stinson LLP
1775 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20006

Jack Frankel, Esq.
Office of the U.S. Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314

American Express
PO Box 297871
Fort Lauderdale, FL 33329

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Barry Spear, Esq. (Nationstar)
BWW Law Group, LLC
8100 Three Chopt Rd., Suite 240
Richmond, VA 23229

Bryson J. Hunter, Esq. (Carter Bank)
Spilman Thomas & Battle, PLLC
310 First Street, Suite 1100 (24011)
PO Box 90
Roanoke, VA 24002

Peter M. Pearl, Esq. (Carter Bank)
Spilman Thomas & Battle, PLLC
310 First Street, Suite 1100 (24011)
PO Box 90
Roanoke, VA 24002

Camba LLC
12647 Belleflower Lane
Fredericksburg, VA 22407

Capital One N.A.
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Carter Bank & Trust
320 College Dr
Martinsville, VA 24112

Carter Bank & Trust
Spilman Thomas & Battle, PLLC
310 First Street, Suite 1100
Roanoke, VA 24011

Citibank NA
PO Box 6241
Sioux Falls, SD 57117

Fairfax County
Office of the County Attorney
12000 Govt. Center Parkway, Suite 549
Fairfax, VA 22035

Fairfax County Department of Tax Admin.
12000 Government Center Pkwy
Fairfax, VA 22035

Fayez Goriup McRae PLLC
4084 University Drive Suite 208
Fairfax, VA 22030

German Kitchen Center
1010 Wisconsin Avenue, NW Suite 200
Washington, DC 20007

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

James E Johnson
Virginia Johnson
11654 Plaza American Dr. #755
Reston, VA 20190

Jonathan B. Vivona, Esq. (Witt)
601 King Street, Suite 400
Alexandria, Virginia 22314

Lafayette Federal Credit Union
c/o Silverman Theologou, LLP
11200 Rockville Pike, Suite 520
N. Bethesda, MD 20852

Offit Kurman, P.C.
7021 Gateway Drive, Suite 200
Columbia, MD 21046

Lafayette Federal Credit Union
2701 Tower Oaks Boulevard
Rockville, MD 20852

Offitt Kurman
7021 Columbia Gateway Drive, Suite 200
Columbia, MD 21046

Mach Rico Floors
6665 Old Dominion Dr
McLean, VA 22101

Paul Riggs
36804 Sawmill Ln
Hillsboro, VA 20132

Mr. Cooper
800 State Hwy 121 Bypass
Lewisville, TX 75067

Pesner Altmiller, Esq.
Melnick Demers & Steele PLC
8000 Westpark Drive, Suite 600
McLean, VA 22102

Nationstar Mortgage LLC
Robertson, Anschutz, Schneid, Crane
13010 Morris Road, Suite 450
Alpharetta, GA 30004

Porcelainosa
600 Route 17 North
Ramsey, NJ 07446

Nationstar Mortgage LLC
Aldridge Pite, LLP
Six Piedmont Center
3525 Piedmont Road, N.E., Ste 700
Atlanta, GA 30305

Ras LaVrar
4012 Raintree Rd
Chesapeake, VA 23321

Nationstar Mortgage LLC
RAS Crane & Partners, PLLC
11900 Parklawn Drive, Suite 310
Rockville, MD 20852

Steven B. Ramsdell, Esq. (Coelho)
Tyler, Bartl & Ramsdell, P.L.C.
300 N. Washington St., Suite 310
Alexandria, VA 22314

Nationstar Mortgage, LLC
c/o Nationstar Mortgage LLC
Attn: Bankruptcy Dept.
PO Box 619096
Dallas, TX 75261-9741

Regiane Coelho
1363 N 31st Apt 417
Philadelphia, PA 19121

Nelnet
P.O. Box 82561
Lincoln, NE 68501

Safetypawz, LLC
11110 Sunset Hills Road #3260
Reston, VA 20195

Bradley M. Barna, Esq. (Oak Manor)
Chadwick, Washington, Moriarty Elmore & Bunn, PC
3201 Jermantown Road, Suite 600
Fairfax, VA 22030

Synchrony Bank
PO Box 965005
Orlando, FL 32896

Synchrony Bank
by AIS InfoSource LP as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Matthew J. Troy, Esq. (IRS)
Assistant United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314

Synchrony Bank
PO Box 965036
Orlando, FL 32896

Office of the US Attorney
2100 Jamieson Ave
Alexandria, VA 22314

TD Bank
13531 E Caley Ave
Englewood, CO 80111

Tenaglia & Hunt
9211 Corporate Blvd., Suite 130
Rockville, MD 20850

Truist Bank
PO Box 1874
Wilson, NC 27894

Truist Bank
Attn: Support Services
P.O. Box 85092
Richmond, VA 23286

U.S. Attorney Office
Courthouse Square
2100 Jamieson Avenue
Alexandria, VA 22314

US Department of Education
PO Box 7860
Madison, WI 53707

Valley View Exteriors
8381 Jill Brenda Court
Manassas, VA 20112

Valley View Exteriors
8381 Jill Brenda Court
Manassas, VA 20112

Verizon
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Wells Fargo
PO Box 14517
Des Moines, IA 50306

Wells Fargo Bank, N.A.
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Witt & Co LLC
4445 Corporation Lane, Ste 264
Virginia Beach, VA 23462

Woodbridge Glass
14312 Richmond Hwy
Woodbridge, VA 22191

/s/ Michael A. Condyles
Counsel